

THE HONORABLE MARSHA J. PECHMAN

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

IN RE: WASHINGTON MUTUAL
MORTGAGE BACKED SECURITIES
LITIGATION,

This Document Relates to: ALL CASES

Master Case No.: C09-0037 (MJP)

**PLAINTIFFS' MOTION TO SEAL
EXHIBIT 1 TO JASNOCH
DECLARATION IN SUPPORT OF
PLAINTIFFS' OPPOSITION TO
DEFENDANTS' MOTION TO
PRECLUDE THE PROFFERED EXPERT
TESTIMONY OF SCOTT D. HAKALA**

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DECLARATION IN SUPPORT OF PLAINTIFFS'
OPPOSITION TO DEFENDANTS' MOTION TO
PRECLUDE THE PROFFERED EXPERT
TESTIMONY OF SCOTT D. HAKALA
Case No. C09-037 MJP

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party's trade secrets); (3) the interests of the parties and the balance of equities"; and (4) "the duty of the court to balance all of these competing interests and to inform the public of the basis for its decision." *See California ex rel. Lockyer v. Safeway, Inc.*, 355 F. Supp. 2d 1111, 1115 (C.D. Cal. 2005) (citing *Nixon v. Warner Commc'ns, Inc.*, 435 U.S. 589, 602-04 (1978)).

II. Documents to be Sealed Are Claimed to Be Subject to Confidentiality Protections of the Protective Order

Exhibit 1 to the Jasnoch Declaration is the transcript of the June 8, 2012 deposition of Scott D. Hakala. This transcript contains several references to trading data which the third parties who produced the materials claim to be subject to confidentiality protections of the Protective Order. While Plaintiffs do not believe any of this material is, in fact, sensitive or confidential, this motion is being filed to comply with the terms of the Protective Order.

CONCLUSION

For the foregoing reasons, and on the basis of the authorities cited, Plaintiffs file this Motion to Seal Exhibit 1 to the Jasnoch Declaration in Support of Plaintiffs' Opposition to Defendants' Motion to Preclude the Proffered Expert Testimony of Scott D. Hakala.

Dated: July 30, 2012

Respectfully submitted,
SCOTT+SCOTT LLP

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CERTIFICATE OF SERVICE

I hereby certify that on July 30, 2012, I caused the foregoing to be electronically filed with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the email addresses denoted on the Electronic Mail Notice List, and I hereby certify that I caused the foregoing document or paper to be mailed via the United States Postal Service to the non-CM/ECF participants indicated on the Manual Notice List.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on July 30, 2012.

/s/ Anne L. Box

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